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February 14, 2022

VIA ECF

Judge Taryn A. Merkl
United States Magistrate Judge
U.S. District Court Eastern District of New York
225 Cadman Plaza East, Courtroom 322 N
Brooklyn, NY 11201

RE: Star Auto Sales of Bayside, Inc., et al. v. Voynow, Bayard, Whyte and Company, LLP,
et al.
Docket No.: USDC of Eastern NY No.: 1:18-cv-05775
Our File No.: 03127.01373

Dear Judge Merkl:

Pursuant to the Court's November 12, 2021 Order, counsel for the parties submit the following joint status report.

The parties continue to be diligently engaged in discovery efforts. Both Plaintiffs and Defendants continue to engage in various written discovery consisting of document production, third-party subpoenas and follow up on various discovery deficiencies. The depositions of four individuals have been noticed and are expected to be completed by mid April, 2022. Specifically, the deposition of Shawn McCormack, a former employee of the Defendant, as well as the depositions of Michael Koufakis, John Koufakis, Jr. and Steve Koufakis, principals of the Plaintiffs, have all been noticed. Counsel for the parties anticipate that additional depositions will be scheduled following the completion of these depositions.

Counsel is available at the Court's convenience to respond to any questions as to the status of this matter.

Respectfully,

Maureen P. Fitzgerald

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cc: Jamie Felsen, Esquire
Emanuel Kataev, Esquire
Jeremy Koufakis, Esquire
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